002-360

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHERYLL CLEWETT and STEVE	)	
BAUS, individually and on behalf of all	)	
other similarly situated,	)	Case No. 1:22-CV-06032
	)	
Plaintiff	)	Honorable Andrea R. Wood
v.	)	
	)	
NATIONAL POLICE & SHERIFFS	)	
COALITION PAC, et. al.,	)	
·	)	
Defendants	)	

## RENEWED MOTION FOR LEAVE TO WITHDRAW APPEARANCE AS COUNSEL FOR DEFENDANT

NOW COMES the Movants, Luke A. Casson and Logan Quan, of A&C Law Group, Ltd., and move this Honorable Court for leave to withdraw his appearance as Counsel for Defendant FRANK PULCIANI ("Pulciani"), and in support thereof states as follows:

- 1. On March 23, 2023, Plaintiffs filed their First Amended Complaint. Dkt. 28.
- On July 5, 2023, Luke A. Casson, Bar ID no. 6257881, President of A&C Law Group, Ltd. (then known as Andreou & Casson, Ltd.) entered his appearance as Lead Counsel for Pulciani. Dkt. 37.
- 3. On August 18, 2023, Logan R. Quan, Bar ID no. 6344255, Associate Attorney at A&C Law Group, Ltd. (then known as Andreou & Casson, Ltd.) entered his appearance as additional Counsel on behalf of Pulciani. Dkt. 41.
- 4. In November 2023, Movant Casson was advised by Mr. Pulciani that he would retain other counsel.

- On November 29, 2023, Attorney Thomas Kimble of The Bernholt Law Firm, S.C. filed his appearance on behalf of Defendant Pulciani and of Co-Defendant National Police & Sheriffs Coalition PAC. Dkt. 49.
- 6. Although Mr. Kimble is not as yet been admitted by the Court as a member of the Trial Bar, he is a member of the general bar and is capable and knowledgeable to participate in the proceedings without Mr. Casson and Mr. Quan.
- 7. Pursuant to Northern District of Illinois Local Rule 83.17, a member of the Trial Bar may not withdraw without leave of court. Movants Luke A. Casson and Logan Quan now request leave to withdraw their appearances on behalf of Pulciani.
- 8. This withdrawal will not delay these proceedings and will not prejudice any party as Pulciani has already secured new counsel as all parties are represented by counsel.
- 9. On December 1, 2023, the Movants filed their motion to withdraw. Dkt. 51.
- 10. The Court has yet to rule on the motion or set this matter for hearing.
- 11. Mr. Pulciani and the Plaintiffs have continued to engage in discovery, without the Movants involvement.
- 12. Since the filing of the Motion to Withdraw Appearance of Counsel, the Movant has accepted a professional opportunity which will prevent further engagement in this matter commencing on February 1, 2024.

WHEREFORE the Movant, Luke A. Casson and Logan Quan, respectfully request that this Honorable Court grant his Motion for Leave to withdraw his Appearance as Counsel for Defendant FRANK PULCIANI ("Pulciani") instanter, or set this matter for hearing, and for all other relief deemed just and proper in the premises.

Respectfully submitted,

A&C Law Group, Ltd.

By: <u>Luke A. Casson</u>

Luke A. Casson President

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